



Bruce Kiselica

08/10/00 03:12 PM

To: Michael Lowy/R2/USEPA/US@EPA

cc: Douglas McKenna/R2/USEPA/US@EPA, Robert Poon/R2/USEPA/US@EPA, Taj Khan/R2/USEPA/US@EPA

Subject: Re: NY Primacy Pkg



I'm not sure either on the MOU = extension request. Concerning the other 2 items Mike spoke to me about.....

1. - **penalty**, they want us to review their existing authority and are hoping we can accept it as is, including it being covered by one of our prior (probably first) primacy approvals,

2. - **examples of emergencies**, they want us to review what they already have in their internal/external procedures submitted with their first primacy application and are hoping we can accept it as is.

for no. 1, it's up to ORC, but with a little help (via an explanation from Burke of how their existing authority meets the new requirement) I think ORC can accept it.

for no. 2, what we saw in their first primacy application looks to me like it covers the stated examples, but again, Burke could help out on this by providing the latest version of their procedures.

bk

Michael Lowy



Michael Lowy

08/10/00 02:29 PM

To: Bruce Kiselica/R2/USEPA/US@EPA

cc: Douglas McKenna/R2/USEPA/US@EPA, Robert Poon/R2/USEPA/US@EPA

Subject: Re: NY Primacy Pkg

Bruce:

At least I got a response from NYS, as opposed to the other 2 (forgetting the VI for the moment). I assume by MOU for the CCR, he means the extension request, altho I'm not sure, I'll check with him.

By the other two, I think he means the admin penalty and PWSS def. As far as I know, we'll need an AG cert for the fact that they've changed their definition. Have you had recent communication with Burke on the Admin Penalty?

----- Forwarded by Michael Lowy/R2/USEPA/US on 08/10/00 02:25 PM -----



rae01@health.state.ny.us

08/10/00 01:58 PM

To: Michael Lowy/R2/USEPA/US

cc:



Subject: Re: NY Primacy Pkg

1/2 The extension request for IESWTR/DBPR has been signed and on its way. I have drafted an MOU for the CCR.
3/4. The PWS definition will be adopted with the CCR. Mike has spoken to Bruce about the other two.